

HULL

Environment / Energy / Infrastructure

From GM Linden

NJD 002 186 690

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March 6, 2018

Mr. Gary Greulich
New Jersey Department of Environmental Protection
Northern Regional Office
7 Ridgedale Avenue
Cedar Knolls, NJ 07927

RE: Remedial Action Progress Report No. 34 for the Retail Redevelopment Area Portion of the Former General Motors (GM) Linden Assembly Plant, 1016 West Edgar Road, Linden, Union County, New Jersey 07036; LDN001.0002.

Dear Mr. Greulich:

On May 26, 2009, the New Jersey Department of Environmental Protection (NJDEP) approved the New Jersey Remedial Action Workplan and RCRA Corrective Measures Proposal Addendum No. 1 (RAWP) for the Retail Redevelopment Area of the Former GM Linden Assembly Plant (site; SRP PI# 014755; EA ID# SUB090001; BFO File Number: 20-09-24). The May 26, 2009 approval letter requested a Remedial Action Progress Report for the Retail Redevelopment Area on/by November 30, 2009. Subsequent reports are submitted on a quarterly basis.

This letter constitutes Remedial Action Progress Report No. 34 for the Retail Redevelopment Area. Hull & Associates, Inc. (Hull) has prepared this report on behalf of Linden Development LLC (Linden Development) to summarize remedial activities completed on the site between December 1, 2017 and February 28, 2018.

Requirements, according to N.J.A.C. 7:26E-6.6, are shown below in **bold italics**, with Hull/Linden Development's update following. The report certification required by N.J.A.C. 7:26E-1.5 is included in Attachment A.

1. NJDEP requires a description of each planned remedial action.

- i. ***scheduled to be initiated or completed within the reporting period;***
- ii. ***actually initiated or completed during the reporting period; and***
- iii. ***scheduled but not initiated or not completed during the reporting period, including the reasons for the noncompliance with the approved schedule.***

Soil

As outlined in the approved RAWP, the remedial activities for soils on the Retail Redevelopment Area consist of the following:

- a. Establishing deed restrictions or environmental covenants to maintain commercial/industrial land use at the site;
- b. Regrading the site to achieve the grade necessary to support the proposed redevelopment;
- c. Constructing building slabs, parking areas and roadways and placing one foot of clean soil over geotextile fabric in future greenspaces to preclude direct contact exposures to future receptor populations and/or provide cover to historical fill material; and
- d. Surveying to demonstrate that all areas are covered with engineering controls (e.g., building slabs, parking areas and roadways) or one foot of clean soil.



These remedial activities are directly related to construction activities associated with the future redevelopment at the site which are dependent upon finalization of agreements with end users. Linden Development is presently working to finalize a number of agreements with end users that will occupy various portions of the site. Therefore, significant construction activities described in the RAWP have not yet been initiated. Construction support activities that have been conducted thus far included importing fill material, as discussed below.

Fill Material Import Activities

As outlined in previous quarterly reports, Linden Development has previously imported structural fill materials and cover soils from off-site sources for use during the redevelopment consistent with the RAWP and the Revised Soil and Concrete Reuse Proposal (Revision 1.0) approved by NJDEP.

During the reporting period, no fill materials were imported onto the Retail Redevelopment Area.

Groundwater

As outlined in the approved RAWP, remedial actions related to groundwater underlying the overall Retail Redevelopment Area do not appear to be necessary. However, sporadic historical concentrations of lead in limited monitoring wells have exceeded groundwater quality criteria at the site, as observed in previous groundwater sampling data. As a result, the NJDEP may consider that an indeterminate Classification Exception Area (CEA) is necessary due to these sporadic exceedances and the presence of historical fill at the site. Based on discussions with Mr. Greulich conducted since November 2009, the indeterminate CEA will be established by NJDEP as part of finalizing the site NFA and will include the overburden aquifer within the site boundaries. As discussed on November 18, 2009 and reiterated during ongoing quarterly meetings, Mr. Greulich currently maintains the information necessary to establish the indeterminate CEA (if ultimately deemed necessary) and no additional submittals by Linden Development are required.

As discussed in previous quarterly reports, trichloroethene (TCE), tetrachloroethene (PCE), 1,1-Dichloroethene (1,1-DCE) and vinyl chloride were detected in overburden groundwater at concentrations exceeding the NJDEP Class IIA groundwater standards within a limited portion of the proposed Walmart parcel and MW-98 Well cluster within the Retail Redevelopment Area. On January 25, 2018, a Groundwater Remedial Investigation / Remedial Action Report, Groundwater Remedial Action Permit Application, CEA, Receptor Evaluation and Case Inventory Document and Map were submitted to NJDEQ proposing a natural attenuation remedy for the VOC contamination in this limited area. The monitoring plan proposes biennially groundwater sampling of monitoring wells MW-98S, MW-98D, MW-98B, MW-17SR, MW-17D, MW-56D and MW-61S for VOCs.

Storm Sewer (AOI-18)

Remedial activities associated with AOI-18 are complete, as documented in Remedial Action Progress Report No. 1 (November 2009).

2. *NJDEP requires discussion of problems and delays in the implementation of the RAWP, which should include proposals for corrections.*

As discussed above, remedial activities are directly related to construction activities associated with the future redevelopment at the site which are dependent upon finalization of agreements with end users. The construction activities described in the RAWP will not be implemented until redevelopment deals with end users are finalized.

Linden Development is continuing to pursue and finalize agreements with end users for the Retail Redevelopment Area. In the interim, conditions at the site are stable given that GM's original cover types (asphalt, building pads, etc.) remain intact.

3. NJDEP requires proposals for a deviation from, or modification to, the approved RAWP.

As discussed with the NJDEP Case Manager on August 25, 2015, it is not anticipated that additional groundwater response actions related to PCE, TCE, 1,1-DCE and vinyl chloride in overburden groundwater at the proposed Walmart parcel/MW-98 well cluster area will be required. No deviations from, or modifications to, the approved RAWP are planned or required at this time. As discussed previously, a CEA will be established over a portion of the Retail Redevelopment Area with biennial monitoring of select wells.

4. NJDEP requires submittal of a revised schedule pursuant to N.J.A.C. 7:26E-6.5, to reflect the changes as noted in 1 through 3 above.

As discussed with the NJDEP Case Manager during previous meetings, implementation of the site earthwork activities is dependent on finalization of development agreements with end users. Agreements with end users are in progress of being finalized. It is anticipated that some agreements will be finalized in the next reporting period with site earthwork and construction activities starting later in the year. Linden Development will provide NJDEP with a detailed schedule as agreements and schedules are finalized.

5. NJDEP requires an updated status of all permit applications relative to the critical path schedule.

The permits required for initiation of the remedial activities are summarized below.

Permit/Approval Type	Status	Notes
Planning Board Approval	Approved 7/8/08	City of Linden Planning Board Adopted Resolution for Subdivision
NPDES Permit (Storm Water)	Approved 9/16/09 Renewed 3/1/2017	General NPDES Permit No. 0088323
Soil Conservation District	Approved 9/19/17	Approved by Somerset-Union Conservation District

6. NJDEP requires a listing of each remedial action to be performed during the next reporting period.

Linden Development is presently working to finalize agreements with end users that will occupy various portions of the site. It is anticipated that some agreements will be finalized in the next reporting period with site earthwork and construction activities starting later in the year. Linden Development will provide NJDEP with a more detailed schedule as agreements are finalized.

7. NJDEP requires costs of each remedial action.

- i. **Annual summary of all remedial action costs incurred to date; and**
- ii. **Revised cost estimate for remedial actions remaining to be performed.**

Given that significant construction and remedial implementation has not yet commenced, significant remedial costs have not yet been accrued, except for minor costs for the storm sewer cleaning (i.e.,

approximately \$7,000) reported in Remedial Action Progress Report No. 1 and approximately \$128,000 for site work grading and seeding activities to date.

The cost estimate for completing remedial activities remains consistent with that presented in the RAWP (i.e., approximately \$7,500,000 for earthwork and construction of engineering controls).

8. ***NJDEP requires a tabulation of sampling results (according to N.J.A.C. 7:26E-3.13(c)3) received during the reporting period and a summary of the data and any conclusions, presented in a format consistent with N.J.A.C. 7:26E-4.8.***

No sampling occurred during the current reporting period.

9. ***NJDEP requires a summary of active groundwater remedial actions.***

- i. ***groundwater elevation maps with groundwater flow shown immediately before and during active groundwater remediation;***
- ii. ***graphs depicting changes in concentrations over time for all impacted wells as well as all down-gradient wells;***
- iii. ***summary of volume of water treated since last reporting period and the total volume treated since active remedial action commenced; and***
- iv. ***Summary of groundwater contamination, indicating either that contamination remains above applicable standards (include a proposal detailing additional remedial actions) or that concentrations are below applicable standards.***

As outlined in the approved RAWP, remedial actions related to groundwater underlying the Retail Redevelopment Area do not appear to be necessary (see discussion under item 1).

10. ***NJDEP requires a summary of natural remediation groundwater remedial actions.***

- i. ***Summary table of the groundwater monitoring results collected; and***
- ii. ***Conclusions whether data indicate that natural remediation is no longer appropriate (must then also submit a revised RAWP).***

As discussed in Item 1, a Groundwater Remedial Action Permit application were submitted to NJDEQ proposing a natural attenuation remedy for VOC contamination in overburden groundwater within the proposed CEA. The proposed monitoring plan includes biennially groundwater sampling of monitoring wells MW-98S, MW-98D, MW-98B, MW-17SR, MW-17D, MW-56D and MW-61S for VOCs.

11. ***NJDEP requires a description of all wastes generated as a result of the remedial action.***

- i. ***Tabulation of waste characterization samples collected, including the physical state of the material, volume, number of samples, analyses performed and results;***
- ii. ***Listing of types and quantities of waste generated by the remedial action during the reporting period as well as to date;***
- iii. ***Name of the disposal facility used;***
- iv. ***Transporters' dates of disposal; and***
- v. ***Manifest numbers of each waste shipment.***

No investigative derived waste (IDW) was generated during the reporting period.

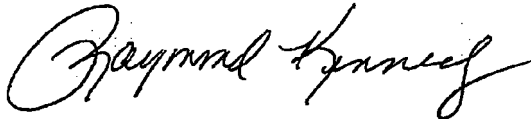
Mr. Gary Greulich
LDN001.0002
March 6, 2018
Page 5

12. ***NJDEP requires that any additional support documentation that is available also be provided (photos, etc.).***

Given that the majority of the remedial activities have not yet been implemented, no additional support documentation is available.

The next scheduled remedial action progress report will include remedial actions completed March 1, 2018 through May 31, 2018. Please feel free to contact me at (614) 793-8777 with any questions regarding the update provided herein.

Sincerely,



Raymond Kennedy
Senior Project Manager

Attachments

cc: Clifford Ng – U.S. EPA Region 2
Stephen Pilch – Stockbridge Capital Group
Jackie Li – Stockbridge Capital Group
Jeff Coker – Cypress Equities
Stephen Schmidt – Cypress Equities
David Shute – Cypress Equities
Joseph M. Sorge – J.M. Sorge, Inc.

ATTACHMENT A

Report Certification

Certification

**Linden Development, LLC
ISRA Case Number E20040531-Retail**

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, to the best of my knowledge, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.

Linden Development, LLC, a New Jersey
limited liability company

By: Linden Development, LLC C/O
Stockbridge Fund III Linden Development
Investment LLC
Four Embarcadero Center, Suite 3300
San Francisco, California 94111

Date: 3/7/2018

By: 
Stephen Pilch
Senior Vice-President